

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re

WILLOWBROOK-HINSDALE INN, LLC,
an Illinois Limited Liability Company,

Debtor.

Chapter 11

Case No. 09-10482

Honorable Eugene Wedoff

NOTICE OF MOTION

PLEASE TAKE NOTICE that on August 3, 2010 at 10:00 a.m., or as soon thereafter as counsel may be heard, we will appear before the Honorable Eugene R. Wedoff, or any judge sitting in his stead, in Room 744 of the Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois 60604, and present the **MOTION FOR ENTRY OF A FINAL DECREE CLOSING DEBTOR'S BANKRUPTCY CASE**, a copy of which is hereby served upon you.

Respectfully submitted,

WILLOWBROOK-HINSDALE INN, LLC

By: /s/ Daniel A. Zazove
One of its Attorneys

Daniel A. Zazove, ARDC No. 3104117
Perkins Coie LLP
131 South Dearborn Street, Suite 1700
Chicago, IL 60603-5559
312.324.8400

Dated: July 23, 2010

THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re

WILLOWBROOK-HINSDALE INN, LLC,
an Illinois Limited Liability Company

Debtor.

Chapter 11

Case No. 09-10482

Honorable Eugene Wedoff

**MOTION FOR ENTRY OF A FINAL DECREE CLOSING
DEBTOR'S BANKRUPTCY CASE**

Willowbrook-Hinsdale Inn, LLC (the "Debtor") submits this motion (the "Motion") for entry of a final decree closing its bankruptcy case. In support of this Motion, the Debtor respectfully states as follows:

Jurisdiction and Venue

1. This Court exercised jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. The statutory bases for the relief sought herein are section 350(a) of the United States Bankruptcy Code and Rule 3022-1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Illinois (the "Local Rules").

Background

3. On March 26, 2009 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. On September 30, 2009, the Bankruptcy Court entered the Order Confirming Debtor's Second Modified Chapter 11 Plan ("Plan").

5. The Plan has been substantially consummated. All payments have been made to allowed secured, unsecured and administrative expense claims in accordance with the Confirmed Plan. The Debtor acknowledges that it must pay the outstanding U.S. Trustee quarterly fees for the present quarter, which it expects to do prior to the hearing on this Motion.

6. Section 350(a) of the Bankruptcy Code provides in relevant part:

“After an estate is fully administered and the court has discharged the trustee, the court shall close the case.”

7. 7 days prior notice of the hearing on this motion has been severed upon the US Trustee, all secured creditors and all creditors whose allowed claim are paid from future revenue of the Debtor. The Debtor submits that notice to creditors whose claims have been fully paid is unnecessary.

WHEREFORE, the Debtor respectfully requests that this Court enter a final decree closing this chapter 11 case upon notice as provided above and granting such other relief as is necessary and proper.

Respectfully submitted,

WILLOWBROOK-HINSDALE INN, LLC

By: /s/ Daniel A. Zazove
One of its Attorneys

Daniel A. Zazove, ARDC No. 3104117
Perkins Coie LLP
131 South Dearborn Street, Suite 1700
Chicago, IL 60603-5559
312.324.8400

Dated: July 23, 2010

CERTIFICATE OF SERVICE

I, Daniel A. Zazove, an attorney, certify that I caused to be served upon the parties listed below a true and correct copy of the **MOTION OF THE DEBTOR FOR ENTRY OF A FINAL DECREE CLOSING DEBTOR'S BANKRUPTCY CASE** via electronic transmittal or First Class Mail, as indicated, by 5:00 p.m. on July 23, 2010

Hauselman Rappin & Olswang Ltd. Steven R. Rappin 39 S. LaSalle Street Suite 1105 Chicago, IL 60603	DuPage County Treasurer's Office First Floor - South 421 N. County Farm Road Wheaton, Illinois 60187
Chicago Style Weddings 1008 Bonaventure Drive, Elk Grove Village, IL	World Cinema, Inc. Attn: Juli Loving 9801 Westheimer, Ste 409, Houston, TX 77042
Clear Channel Outdoor Attn: Toby Sturek 600 West Chicago Ave., Suite 600 Chicago, IL 60610	Tom & Jerry Tire & Service Center 7505 Kingery Hwy, Willowbrook, IL 60521
DuPage County Public Works Department Attn: Alison Stutts 421 N. County Farm Road Wheaton, IL 60187	Airport Accommodations Attn: Deb Simpson 6810 Mannheim Road, Rosemont, IL 60018,
Holiday Hospitality Franchising Leib M. Lerner Alston & Bird LLP 333 South Hope Street, 16 th Floor Los Angeles, CA 90071	Jonathan M. Levine Chiefetz Iannitelli Marcolini PC 1850 North Central Ave, 19th Floor Phoenix, AZ 85004
Illinois Dept. of Revenue Bankruptcy Section Level 7-425 100 W. Randolph Chicago, IL 60601	Midamerica Energy Company Legal Department 320 LeClair, Davenport, IA 52801
Konica Minolta Business Solutions Attn: Tracy Jenkinson 10201 Centurian Pkwy N, Ste 100, Jacksonville, FL 32256	Dex Legal Department 1615 Bluff City Hyw, Bristol, TN 37620

Lodgnet Interactive Corp. Attn: Steven J. Rindsig 3900 West Innovation Street , Sioux Falls, SD 57101-7002	Waste Management IL - Metro Attn: Jim Kearney 1411 Opus Place, Ste. 400, Downers Grove, IL 60515
Office of the US Trustee Attn: Stephen G. Wolfe 219 S. Dearborn Suite 873 Chicago, IL 60603	CIMCO Communications PO Box 95900 Chicago, IL 60694
Robert J. Henry Scopelitis, Garvin, Light,Hanson & Feary 30 West Monroe Street, Suite 600 Chicago, IL 60603	Holiday Hospitality Franchising c/o William D. Brejcha Scopelitis, Garvin, Light,Hanson & Feary 30 West Monroe Street, Suite 3800 Chicago, IL 60603
Sunshine Graphics Legal Department 3 Golf Center PMB, Ste 234, Hoffman Estates, IL 60195	Illinois Hotel & Lodging Assn. Legal Department 27 East Monroe, Ste 1200, Chicago, IL 60603
Tantus Networks Legal Department 850 W. Jackson, Ste 250, Chicago, IL 60607	McFarlane Douglass & Company Legal Department 143 Tower Drive, Burr Ridge, Il 60527
Thyssenkrupp Elevator Corp. Attn: Linda Benson 2305 Enterprise Drive Westchester, IL 60154	Lato Supply Corp. Attn: Allen Lato 3828 W. Witton Avenue, Phoenix, AZ 85019
Village of Willowbrook Legal Department 7760 Quincy Street, Willowbrook, IL 60527	Santana Energy Services Legal Department 120 E. Ogden, Ste. 236, Hinsdale, IL 60521
Cit Technology Financing Services, Inc. 175 S 3 Street Suite 900 Columbus, OH 43215	ComEd Co. Attn: Bankruptcy Section/Revenue Management 2100 Swift Drive OakBrook, IL 60523
Public Storage 801 Joliet Road Willowbrook, IL 60527	Staples Business Advantage 500 Staples Drive Framingham, MA 01702
Sysco Food Services Chicago Inc. 250 Wieboldt Dr Des Plaines, IL 60016	

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